

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

CHARLES W. AND AMY W. BAKER

PLAINTIFFS

VS.

CIVIL ACTION NO. 1:08cv649-LTS-RHW

**NATIONWIDE MUTUAL
FIRE INSURANCE COMPANY**

DEFENDANT

MOTION FOR EXTENSION OF DISCOVERY DEADLINE

Defendant Nationwide Mutual Fire Insurance Company ("Nationwide"), by and through counsel, files this Motion for Extension of Discovery Deadline in this matter. In support of this Motion, Nationwide states as follows:

1. Pursuant to the Scheduling Order entered by the Court in this matter, the discovery period ends on Monday, December 7, 2009. Due to various scheduling conflicts involving both witnesses and counsel, the parties in this matter have been unable to complete discovery within the current discovery period.

2. This matter is scheduled for trial for the 3 week trial calendar beginning July 26, 2010.

3. Nationwide respectfully requests that discovery in this matter be extended until Monday, February 15, 2010 and re-setting the Motion deadline to Monday March 1, 2010.

4. This request for additional time to complete discovery is made in good faith, and not for purposes of delay or harassment. If granted, this extension should not affect the scheduled trial date as the proposed discovery deadline of February 15, 2010 is 22 weeks before the July, 2010 trial calendar.

5. Undersigned counsel for Nationwide has discussed this request with Plaintiffs' counsel and has been advised that the Plaintiffs have no objection to extending the discovery deadline to February 15, 2010.

WHEREFORE, PREMISES CONSIDERED, Nationwide prays that its Motion for Extension of Discovery Deadline be granted, and that this Court enter an Order extending the discovery deadline to Monday, February 15, 2010 and re-setting the Motion deadline to Monday March 1, 2010.

THIS, the 4th day of December, 2009.

Respectfully submitted,

NATIONWIDE MUTUAL FIRE INSURANCE
COMPANY, DEFENDANT

By Its Attorneys,
WATKINS LUDLAM WINTER & STENNIS, P.A.

By: /s/ F. Hall Bailey

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

Charles R. McRae

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This, the 4th day of December, 2009.

/s/ F. Hall Bailey

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